

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
COOKEVILLE DIVISION

UNIVERSAL TECHNOLOGIES, INC.,)
and JESSE E. ROGERS,) Case No. 2:14-cv-00091
)
Plaintiffs,)
)
v.)
)
FAYE CLEEK, CARLA BEAN,)
NICHOLAS BEAN, GAYE)
LAWDERMILK, CYNTHIA)
MATLOCK, UNIVERSAL SERVICES &)
SUPPLY, ARAIZA, and ARAIZA)
COMPANY, LLC,)
)
Defendants.)

Judge Sharp
Magistrate Judge Brown

JURY DEMAND

**MOTION BY CONSENT OF ALL PARTIES TO MODIFY CASE MANAGEMENT
ORDER**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants Faye Cleek, Gaye Lawdermilk, Araiza, and Universal Services & Supply hereby respectfully move, with consent of all parties, that the Case Management Order (D.E. 36) be modified by changing the following deadlines:

1. The Parties shall complete all written discovery and depose all fact witnesses on or before **September 25, 2015**.
2. Plaintiffs shall identify and disclose all expert witnesses and reports on or before **October 9, 2015**.
3. Defendants shall identify and disclose all expert witnesses and reports on or before **November 6, 2015**.

4. Rebuttal experts and reports, if any, shall be identified and disclosed on or before **November 20, 2015**.
5. The Parties shall depose all expert witnesses on or before **December 11, 2015**.
6. The Parties shall file a joint mediation report on or before **November 27, 2015**.
7. The Parties shall file all dispositive motions on or before **January 8, 2016**.
Responses to dispositive motions shall be filed within **twenty-one (21) days** after the filing of the motion. Optional replies shall be filed within **fourteen (14) days** after filing of the response.

The proposed amended dates will not interfere with the Court's rule requiring at least ninety (90) days between the deadline for a reply to a dispositive motion and the trial date. (LR 16.01(d)(2)(f)) After consultation among counsel for all parties, Plaintiffs Universal Technologies, Inc. and Jesse E. Rogers and Defendants Carla Bean, Nicholas Bean, Cynthia Matlock, and Araiza Company, LLC consent to this motion and modification. The proposed order filed herewith reflects the requested changes.

Respectfully submitted,

/s/ John F. Triggs
John F. Triggs (TN BPR #935568)
Ryan D. Levy (TN BPR #024568)
Paul C. Ney (TN BPR #011625)
Scott M. Douglass (TN BPR # 031097)
Patterson Intellectual Property Law, P.C.
1600 Division Street, Suite 500
Nashville, TN 37203
(615) 242-2400
jft@iplawgroup.com
rdl@iplawgroup.com
pcn@iplawgroup.com
smd@iplawgroup.com

*Attorneys for Defendants Faye Cleek,
Araiza, Gaye Lawdermilk, and Universal
Services & Supply, LLC*

Dru Montgomery (TX BPR # 24010800)
(admitted *pro hac vice*)
The Heartfield Law Firm
2195 Dowlen Road
Beaumont, TX 77706
(409) 866-3318
dru@heartfieldlawfirm.com

*Attorneys for Defendants Faye Cleek and
Araiza*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all counsel of record on August 5, 2015 by electronic means via CM/ECF of the District Court for the Middle District of Tennessee, including:

Patrick W. Ogilvy
R. Douglas Hanson
R. Eddie Wayland
Laura Mallory
King & Ballow
315 Union Street, Suite 1100
Nashville, TN 37201
T: (615) 726-5532
F: (888) 688-0482
pogilvy@kingballow.com
dhanson@kingballow.com
rew@kingballow.com
lmallory@kingballow.com

Buddy D. Perry
Perry Law Firm
P.O. Box 183
Winchester, TN 37324
T: (931) 967-2676
F: (931) 967-4011
buddydperry@bellsouth.net

Paul Kent Bramlett
Robert P. Bramlett
Bramlett Law Offices
P.O. Box 150734
Nashville, TN 37215
T: (615) 248-2828
F: (866) 816-4116
pknashlaw@aol.com
robert@bramlettlawoffices.com

/s/ John F. Triggs
John F. Triggs